

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CHALAMO KAIKOV,

Plaintiff,

Docket No.: 19-CV-2521

-against-

ARIHAY KAIKOV, DUSTIN BOWMAN, SHIRYAK,  
BOWMAN, ANDERSON, GILL & KADOCHNIKOV  
LLP, PACIFIC 2340 CORP., ROYAL A&K REALTY  
GROUP INC., A&E.R.E. MANAGEMENT CORP., NY  
PRIME HOLDING LLC, AG REALTY BRONX  
CORP., JOHN and JANE DOE 1-19, and XYZ  
CORPORATION 1-10,

Defendants.  
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**NOTICE OF MOTION TO  
DISMISS AMENDED  
COMPLAINT  
PURSUANT TO F.R.C.P.  
12(B)(6) AND 9(B)**

**PLEASE TAKE NOTICE** that upon the Declaration of Daniel S. Hallak, dated October 7, 2019, the accompanying Memorandum of Law dated October 7, 2019, and all the papers and pleadings heretofore had herein, Defendants, Arihay Kaikov, Pacific 2340 Corp., Royal A&K Realty Group, Inc., A&E.R.E. Management Corp., NY Prime Holding, LLC, and AG Realty Bronx Corp. (“Moving Defendants”), shall move this Court before the Honorable Jack B. Weinstein, at the United States District Court, Eastern District of New York, at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York 11201, for an order pursuant to FRCP 12(b)(6) and 9(b) dismissing all claims against Moving Defendants with prejudice, together with such other and further relief as to this Court seems just and proper.

Pursuant to the Honorable Magistrate Judge Ramon E. Reyes, Jr.’s Order, dated September 17, 2019 [DE22], Plaintiff’s opposition papers, if any, are to be served upon Moving Defendants

on or before November 11, 2019, with any reply to be served by Moving Defendants on or before November 25, 2019.

Dated: Lake Success, New York  
October 7, 2019

**THE RUSSELL FRIEDMAN LAW GROUP, LLP**  
*Attorneys for Defendants, Arihay Kaikov, Pacific  
2340 Corp., Royal A&K Realty Group, Inc.,  
A&E.R.E. Management Corp., NY Prime Holding,  
LLC and AG Realty Bronx Corp.*

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